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**DOCUMENT OF THE EUROPEAN BANK  
FOR RECONSTRUCTION AND DEVELOPMENT**

# **ECONOMIC INCLUSION STRATEGY**

**REPORT ON THE  
INVITATION TO THE PUBLIC TO COMMENT**

PUBLIC

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## **Report on the Invitation to the Public to Comment Economic Inclusion Strategy (EIS) 2017-2021**

### **Introduction**

The Economic Inclusion Strategy (“EIS” or the “Strategy”) is the EBRD’s first strategy that formalises economic inclusion as one of the key qualities of a sustainable market economy. Covering the period of 2017 – 2021, it sets out the Bank’s private sector focused approach to promote inclusive market economies where full and fair access to labour markets, finance and entrepreneurship and, more generally, economic opportunity is open to all.

In accordance with the 2011 Public Information Policy, the EBRD invited the public to comment on the draft Economic Inclusion Strategy. The draft EIS was disclosed on the EBRD website from 1<sup>st</sup> of March 2017 until 14<sup>th</sup> of April 2017 in English, Turkish, Russian and Arabic languages, on the following page <http://www.ebrd.com/strategies-and-policies/have-your-say.html>.

The publication of the draft EIS was announced broadly through the EBRD’s Civil Society database. The draft EIS was also shared directly with key partners and stakeholders, including civil society organisations (CSOs), non-governmental organisations (NGOs), international and multilateral organisations, bilateral cooperation agencies, government institutions and municipalities, academia and research centres, as well as private sector representatives, business associations, and consultants (listed in Annex I).

In addition to the solicitation of written comments, the EBRD organised a series of public consultation meetings in Almaty, Istanbul, Amman, Belgrade, London and Washington DC in March and April 2017. The meetings provided an opportunity for stakeholders to comment on the EBRD’s operational priorities outlined in the draft EIS of particular relevance to the region and their field of expertise. Metrica Relocations Plus was selected as an implementing partner to assist the EBRD in the organisation of the consultation meetings.

This report provides a summary of the consultation process, key comments received, the EBRD’s responses to the comments and their reflection in the updated strategy document, where applicable. Annex I presents a list of stakeholders consulted. Annex II provides a detailed list of all comments collected during the consultation process.

## 1. Summary of the consultation process

The consultation process took the form of (a) public consultation meetings; (b) bilateral meetings; and (c) written comments.

### a) Public consultation meetings

The EBRD invited comments on the basis of the draft Economic Inclusion Strategy in the course of six public consultation meetings. Table 1 below provides an overview of these meetings and relevant details. The meetings were attended by a broad scope of stakeholders including CSOs, NGOs, international and multilateral organisations, bilateral cooperation agencies, government institutions and municipalities, academia and research centres, as well as private sector representatives, business associations, and consultants. Annex I includes details of the stakeholders consulted, including the participants at the public consultation meetings.

<b>Table 1: List of Public Consultation Meetings</b>		
<b>Date</b>	<b>Location</b>	<b>Number of Attendees</b>
15 March 2017	Almaty, Kazakhstan	19
17 March 2017	Istanbul, Turkey	21
20 March 2017	Amman, Jordan	28
28 March 2017	Belgrade, Serbia	27
30 March 2017	London, UK	11
18 April 2017	Washington DC, US	18

Table 2 summarises the diversity of those that attended the consultation meetings. Of the 324 organisations invited to the six public consultations, 124 representatives attended from 13 different countries. The majority of the participants represented international/multilateral organizations, IFIs, international foundations (35); NGOs, CSOs or national foundations (31); and the private sector as companies, business associations or consultants (25). Participants also attended from academic institutions such as universities, research centres, and think tanks (16); governmental institutions (11); and bilateral cooperation agencies (6). Women (63) and men (61) were represented almost equally.

Eighteen potential participants submitted requests for financial support to participate in the public consultation meetings and sixteen were selected and funding granted, based on pre-established criteria administered by Metrica Relocations Plus.

	Women	Men	Government Institutions / Municipalities	Academia (Universities, Research Centres, Think Tanks)	NGOs / CSOs / National Foundations	Bilateral Cooperation Agencies / Embassies	International / Multilateral Organizations, IFIs, International Foundations	Private sector, Business Associations, Consultants
<b>Albania</b>		1		1				
<b>Armenia</b>	1						1	
<b>Bosnia and Herzegovina</b>		1			1			
<b>Egypt</b>		2			1			1
<b>Georgia</b>	1	1						2
<b>Jordan</b>	11	15	2	2	10	2	7	3
<b>Kazakhstan</b>	8	7	2	1	4		5	3
<b>Kosovo</b>		1		1				
<b>Kyrgyzstan</b>	2	2			1		3	
<b>Serbia</b>	17	8	4	2	7	1	7	4
<b>Turkey</b>	8	10	2	2	6		3	5
<b>UK</b>	5	5	1	4			4	1
<b>US</b>	10	8		3	1	3	5	6
<b>Total (124)</b>	63	61	11	16	31	6	35	25

The format of the public consultation meetings followed the same agenda consistently in all six locations, starting with an overview of the draft Economic Inclusion Strategy, which provided an introduction to the main concepts and target groups, the general approach and vision, the objectives of the EIS, and the progress made to date. This section was followed by three sessions dedicated to each of the strategic priorities in the Strategy, namely (1) access to employment and skills, (2) entrepreneurship and access to finance, and (3) access to services that enhance economic opportunities. During each session, comments were invited from the participants during a discussion after a short presentation of the topic. All meetings (except for the ones on the London and Washington DC) concluded with contributions of three working groups formed by the attendees, where each group summarised their suggestions on one of the strategic priorities. The discussions were facilitated by an independent moderator and the proceedings were recorded for internal use.

**b) Bilateral consultation meetings**

Table 3 provides a list of the bilateral consultation meetings and the dates on which these took place.

<b>Table 3: List of Bilateral Consultation Meetings</b>		
<b>Date</b>	<b>Location</b>	<b>Organisation</b>
17-18 March 2017	Istanbul, Turkey	<ul style="list-style-type: none"> <li>- Undersecretariat of Treasury, Turkey</li> <li>- Ministry for National Education</li> <li>- Turkish Industry and Business Association (TÜSİAD)</li> <li>- Women's International Network</li> </ul>
19-23 March 2017	Amman, Jordan	<ul style="list-style-type: none"> <li>- Ministry of Labour, Jordan</li> <li>- United States Agency for International Development (USAID) Jordan Office</li> <li>- United Nations High Commissioner for Refugees (UNHCR)</li> <li>- UK Department for International Development (DFID) Jordan Office</li> <li>- International Labour Organization (ILO)</li> </ul>
28 March 2017	Belgrade, Serbia	<ul style="list-style-type: none"> <li>- Social Inclusion and Poverty Reduction Unit (SIPRU), Government of Serbia</li> </ul>
5 April 2017	Brussels, Belgium	<ul style="list-style-type: none"> <li>- EU Directorate-General for Migration and Home Affairs (DG Home)</li> <li>- EU Directorate-General for Neighbourhood and Enlargement Negotiations (DG NEAR)</li> <li>- EU Directorate-General for Economic and Financial Affairs (DG ECFIN)</li> </ul>
12 April 2017	London, UK	<ul style="list-style-type: none"> <li>- UK Department for International Development (DFID)</li> </ul>
18 April 2017	Washington DC, US	<ul style="list-style-type: none"> <li>- World Bank</li> <li>- International Finance Cooperation (IFC)</li> </ul>

**c) Written comments**

The draft EIS was released in English on the EBRD's website on 1 March 2017 and was open for written comments for 45 calendar days until 14 April 2017. The draft Strategy was also posted online in Russian, Turkish and Arabic during the consultation period. Ten organizations submitted written comments from various regions and with different fields of expertise.

## 2. Summary of key comments

The comments received in the course of the consultation period have been comprehensive and covered all aspects of the Economic Inclusion Strategy. Key comments that were raised are summarised below, categorised by their thematic or regional focus or general ones that are applicable across the EIS. Annex II presents a detailed table of all comments compiled during the public consultation process, including the input received during the formal consultation meetings, via written submission, or in bilateral meetings. The table also summarise the responses by EBRD management as well as how comments were integrated into the final EIS, where applicable. As per EBRD standard practice, comments are not attributed to individual participants.

### a) Cross-cutting / General comments

- *Focus on policy dialogue:* Several participants suggested that the focus of the EIS on policy engagement in relation to institutional and legal frameworks should be more clearly articulated in the EIS.
- *Public-private cooperation:* A number of stakeholders highlighted the importance of the cooperation between the public and private sectors to achieve inclusion outcomes. The development and implementation of public-private partnerships was widely recommended as an effective instrument particularly in the areas of skills and employment and access to services.
- *Awareness and perception change:* The need to establish a solid business case for companies to develop and implement inclusion activities was highlighted several times. Some participants felt that companies still view inclusion initiatives as a burden rather than an opportunity. It was therefore suggested that the EBRD should create greater awareness of the Strategy within its potential client base as well as among the target groups to promote inclusion and emphasise the economic benefits for all sides.
- *Monitoring and evaluation:* The EIS Performance Monitoring Framework was generally welcomed and suggestions made on enhancing longer term impact monitoring and evaluations of inclusion impact also at country strategy level.

### b) Key comments related to the three strategic priorities

#### (i) Access to Employment and Skills:

- *Skills and training:* This theme attracted a lot of attention from participants, in particular the Bank's engagement with its clients and policy stakeholders on vocational training, work based learning (such as apprenticeships), life-long learning and partnerships with schools and universities. The Memorandum of Understanding signed with the Ministry of Education in Turkey and examples of training partnership between the private-sector and education providers were regarded as steps in the right direction, with suggestions to replicate similar initiatives in other countries. Participants highlighted the importance of addressing skills gaps

and skills mismatch problems by modernising and coordinating vocational training to ensure its relevance and effectiveness to meet the requirements of employers.

- *Inclusive procurement:* Several stakeholders were interested in the examples and experience presented by EBRD on inclusive procurement. The potential to replicate inclusive procurement practices across many areas of public procurement were highlighted.

(ii) Entrepreneurship and access to finance:

- *Consecutive financing and related challenges:* Access to consecutive financing instruments has been identified as a major obstacle for entrepreneurs, regardless of the specific target group, especially for start-ups to remain viable after the first year of operations. It was suggested that collateral requirements constitute a major barrier particularly for women to access business finance. More capacity building was requirement to enhance the capacity of financial institutions to assess business plans or cash flow as part of their loan assessment processes.
- *Financial literacy:* Various comments highlighted the importance of entrepreneurship training especially for young people and women. The EBRD's business advisory services were welcomed in this context.

(iii) Access to services that enhance economic opportunities:

- *Access to information and services in rural areas:* Contributors from various countries agreed that there are large disparities between the different regions within their country and/or between the urban and rural areas. The importance of access to communication and ICT services for remote areas was underlined as critical to open up access to markets, finance as well as remote learning and skills development. Other important areas raised included transport connectivity and improvements in municipal infrastructure and services, including in areas with high numbers of refugees.
- *Access to facilities for people with disabilities:* The lack of accessible educational institutions and (public and private sector) workplaces for people with disabilities was highlighted several times. This requires public and private support and investment in the facilities as well as potential regulatory reforms for monitoring and enforcement.

**c) Key comments related to specific countries or regions**

- *Kazakhstan and Central Asia:* Many participants pointed towards the need to upgrade the skills of labour market entrants as well as the existing workforce, particularly in sectors that undergo longer term changes, for example the energy sector (to migrate mining workers towards jobs in the renewable energy or green economy sectors). The need for training in the context of the economic diversification of Kazakhstan was also highlighted, including sectors such as in tourism and light manufacturing which are currently underrepresented sectors in the country.

- *Turkey*: With the ongoing refugee crisis in Turkey, the widening of the EIS to include refugees and migrants as a specific target group was welcomed. Challenges faced by refugees were highlighted in the area of access to finance, including KYC barriers for refugees, the backlog in registration, as well as other legal or administrative barriers. Regarding employment opportunities for refugees, the EBRD was encouraged to closely engage with existing initiatives in the host country to address this issue.
- *Jordan and the Southern and Eastern Mediterranean (SEMED) region*: Slow economic growth and challenging economic conditions were raised as key concerns for the region. Economic inclusion, especially of refugee population, should be considered in the context of boosting and sustaining economic growth. Jobs and training opportunities should be specifically targeted at the economically inactive workforce, particularly women and young people. Several participants raised the issue that women still faced various barriers to develop their own businesses due to cultural norms, lack of a working background or childcare support.
- *Serbia and the Western Balkans*: EU accession requirements shape policy priorities in Serbia and other countries in the region and initiatives that are aligned with these receive higher levels of government support. Skills and access to employment for young people constitute a major challenge for the country, resulting in a lot of interest in work based learning programmes, partnerships between employers and schools/universities, and the improvement of national skills standards based on private sector engagement. Another important topic in the region is providing access to employment, services and economic opportunities in general for people with disabilities in post-conflict economies.

### 3. EBRD responses

Annex II provides a summary of comments received at the six events, bilateral meetings and through written comments together with responses given by the EBRD and references to associated updates in the EIS. The types of contributions are twofold and related responses have been provided accordingly: (i) comments raised for clarification purposes are addressed by relevant explanations, and (ii) comments containing suggestions on the content and format of the Strategy have been considered in the review and revision of the draft EIS.

To avoid any repetition, the comments have been organised by themes with one common response covering similar questions. The EBRD has used a consistent approach in its responses. Some answers are substantially longer due to the complexity of certain questions; this does not mean the issue is of more importance.

The EBRD believes that the updated Economic Inclusion Strategy has greatly benefitted from this consultation period. The Bank would like to thank all participants in the consultation process for offering their insights, expertise and experience in order to improve the EIS and, with that, the effectiveness and impact of the EBRD's work on economic inclusion over the next 5 years.

## **Annex I: Stakeholders consulted**

### **Government Ministries / Agencies:**

- Australia
- Jordan
- Serbia
- Switzerland
- Taiwan
- Turkey
- United Kingdom

### **Multilateral Organizations and Development Banks:**

- Eurasian Development Bank
- European Training Foundation (ETF)
- European Union (EU)
- International Labour Organization (ILO)
- Organization for Economic Co-operation and Development (OECD)
- Organization for Security and Co-operation in Europe (OSCE)
- United Nations Development Programme (UNDP)
- United Nations High Commissioner for Refugees (UNHCR)
- World Bank (WB)
- International Finance Cooperation (IFC)

### **Members of the EBRD Internal Working Group:**

- Economics, Policies and Governance
- Environmental and Social Department / Gender Team
- Office of the Chief Economist
- Country Strategy Results Management
- Banking: Financial Institutions, Energy Group, Infrastructure Group, ICA (Industry, Commerce, and Agribusiness), Equity, Advice for Small Businesses, SME Finance & Development)
- Civil Society Engagement Unit
- Communications
- Donor Co-financing
- Innovation Hub
- Local Currency and Capital Market Development
- Resident Offices: Amman, Astana, Belgrade, Casablanca, Istanbul, Kiev, Tbilisi

**List of organisations that participated in the public consultation meetings  
or submitted written comments**

<b>Country</b>	<b>Name of organization</b>
Albania	Albanian Socio Economic Think Tank
Armenia	Helsinki Citizen's Assembly Vanadzor Office
Bosnia and Herzegovina	Centres for Civic Initiatives
Croatia	Croatian Youth Network
Egypt	Expertise Consultancy House
	New Vision For Development
Georgia	Georgian Association of Women in Business
	Association for Farmers Rights Defense
Jordan	ILO Jordan Office
	Care International
	Young Entrepreneurs Association
	Amman Center for Human Rights Studies
	Jordan Education for Employment
	Jordan Forum for Business and Professional Women
	Petra National Trust
	Women Access to Entrepreneurship, Development and Training
	Ruwwad
	INJAZ
	Partners-Jordan
	The Holy Land Institute for Deaf & Deafblind
	I Learn
	UNHCR Jordan
	USAID Jordan
	British Council Jordan
	Vocational Training Corporation
	Yarmouk University – Refugees, Displaced Persons, and Forced Migration Studies Centre
	HelpAge International
	Motivators For Training
U.S. Treasury Office of Technical Assistance	
Fundación Promoción Social de la Cultura	
The Princess Taghrid Institute for Development and Training	
HR Pulse	
Kazakhstan	Soros Foundation Kazakhstan
	Kazakhstan Foundation for cultural, social and educational development (KFesed)
	Kazakhstan International Bureau for Human Rights and Rule of Law

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	Kazakhstan Industry Development Institute JSC (KIDI)
	OSCE Programme Office in Astana
	Association of Business Women of Kazakhstan
	Eurasia Foundation of Central Asia
	“Damu” Entrepreneurship Development Fund” JSC
	Sange Research Center
	Zhaiyk-Caspian Aarhus Centre
	Almaty Aarhus Centre
	Coalition for Green Economy and G-Global Development
	Eurasian Development Bank
Kosovo	Riinvest Institute for Development Research
Kyrgyzstan	Aga Khan Foundation (Kyrgyzstan)
	Public Association “Resource Centre for Elderly” (RCE)
	OSCE Centre in Bishkek
	Aarhus Centre in Osh
Serbia	Australian Embassy Belgrade
	Center for Civil Society Development ‘Protecta’
	SEE ICT
	Network for Business Development
	Edukacioni Centar
	Open Club – Association for Development of Children and Youth
	Innovation Fund
	Asocijacija za razvoj opstine Bor
	Social Inclusion and Poverty Reduction Unit (SIPRU), Government of Serbia
	Belgrade Open School
	ILO Serbia Office
	Responsible Business Initiative Smart Kolektiv
	National Alliance for Local Economic Development
	Association of Business Women in Serbia
	World Bank Serbia Office
	OECD Serbia Office
	National Employment Office
	UN Serbia Office
	German-Serbian Initiative for sustainable growth and employment
	Open Society Foundation Serbia
University of Belgrade – Faculty of Economics	
Turkey	C@rma
	Jana Impact
	Women Entrepreneurs Association of Turkey (KAGİDER)
	Economic Development Foundation (IKV)

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	Turkish European Foundation (Turkiye Avrupa Vakfi)
	Association for Solidarity with Asylum Seekers and Migrants
	Nilufer Kent Konseyi / Nilufer Municipality
	Open Society Foundation Turkey
	Global Relations Forum / Global İlişkiler Forumu
	Union of Chambers and Commodity Exchanges of Turkey (TOBB)
	ILO Turkey Office
	Turkish Industry and Business Association (TUSIAD)
	International Confederation of Agriculture and Food (TARIMKON)
	UNHCR Turkey
	Building Markets
	Turkish Women’s International Network
	Undersecretariat of Treasury
United Kingdom	Citigroup
	Federation for Industry Sector Skills and Standards
	People 1 <sup>st</sup>
	Care International
	Commonwealth Development Corporation (CDC Group)
	London School of Economics
	Chatham House – The Royal Institute of International Affairs
	Open Society Foundations
	International Rescue Committee
EU Brussels	Asia House
	DG Home
	DG Near
	DG Ecfm
Unites States	Deloitte LLP
	USAID
	Cardno Emerging Markets
	World Bank
	National Cooperative Business Association
	Center for Global Development
	Ernst & Young
	International Finance Corporation
	Chevron
	Catalyst Institute for Applied Policy
	Accenture Development Partnerships
	Mawr Foundation

## Annex II Comments received, EBRD responses and references in the updated EIS

	Comment	Source	EBRD Response	Reference to Revisions in the EIS
<b>Access to Employment and Skills</b>				
1	Consider including activities and programs to <b>re-train the pre-retirement workforce</b> with business and IT skills.	Almaty, Written comments	The EIS provides for the careful and gradual expansion of the EBRD's inclusion methodology to integrate a focus on ageing populations (through the country strategy lens and supported by country level diagnostic studies). This will be done in partnership with interested clients to develop training / up-skilling programmes in skills areas that are relevant to the client. It is expected that these will include ICT skills and business skills.	
2	Improving the <b>vocational training facilities</b> is important to align the needs of employers' with training standards. The strategy should consider support for modern equipment and facilities in education institutions. This may be particularly relevant for disabled people for whom the inclusion into training and employment opportunities often depends on the availability of support facilities.	Almaty, Amman, London	The lack of adequate training facilities is recognised as a barrier to quality education and training across many parts of the EBRD region. The Bank works in partnership with its clients to enhance local training facilities (e.g. by encouraging private sector sponsorship of vocational schools which can include facility upgrades and teacher training in new technologies).	A reference to supporting improved training facilities has been added.
3	Integrate <b>soft skills</b> and behavioural and mind-set changes in the training programmes to be developed under the strategy.	Almaty	This is an important aspect in particular in relation to the Bank's equal opportunities programmes with clients - and an area to be focused on further as part of the potential expansion to new groups.	
4	In projects and policy dialogue, make sure to link between the <b>public employment services</b> and the <b>national qualifications framework</b> to facilitate job-matching. Note that some countries are still finalizing their national qualifications framework. Public employment services are critical partners in any employment strategy,	Istanbul, Written comments	As part of its policy dialogue programme on improving national skills standards through public - private sector engagement, the Bank will invite the National Employment Agency (ISKUR) to participate in the programme. This will also be applied to other policy engagement programmes that are currently	National Employment Agencies have been added as key local stakeholders / partners.

	strengthening national efforts to match skills and jobs (supply and demand) and addressing deficiencies where these exist through appropriate skills profiling, development, upgrading, accreditation and recognition.		under development in Central Asia and other regions.	
5	Curriculum-based <b>career guidance services</b> have the potential to equip youth with soft and job search skills as well as information on employment and training opportunities key to a successful integration into the labour market. Private sector participation will ensure to make career guidance, job fairs and other intermediation services successful demand driven approaches to facilitate the transition into jobs.	Written comments	The EBRD closely cooperates with its clients as well as other relevant stakeholders to smooth the school-to-work transition for youth. To this end, we encourage our clients to establish bridges with educational institutions and jointly design and undertake activities to the betterment of skills match. These activities include but are not limited to career guidance, job fairs and other intermediation services.	
6	<b>Strengthen the Bank's policy engagement</b> to ensure that vocational training standards and training provisions are updated, coordinated, and consistent with the needs of the business sector. For a systemic impact, this should be targeted at the policy-level going beyond the project-based, private training centres.	Almaty, Istanbul, Amman, Belgrade, London, Written comments	The EBRD has a strong focus on systemic impact through policy engagement based on cross-country and country specific analytics and project engagement. It is based on (i) skills mis-match assessment at country level as part of the inclusion gaps; (ii) skills mis-match diagnostic studies in support of Country Strategy developments, and (iii) large scale inclusion policy engagement programmes to establish national skills standards based on employer needs (with participation of EBRD clients, chambers of commerce and other relevant stakeholders).	More emphasis has been placed on the EBRD's inclusion policy engagement programmes.
7	Recommend adding a focus on <b>higher-education</b> at university level into the inclusion strategy in addition to the existing focus on vocational training.	Istanbul, Amman, Belgrade	In the context of the EIS, the EBRD is looking to expand its focus on this issue, such as when the EBRD facilitated partnerships between companies and universities to enhance R&D functions and improve access to research grants. The EBRD also supports clients to establish partnerships with universities to offer scholarships, traineeships and internships in	The reference to tertiary education has been strengthened.

			order to improve the progression routes from education into employment for graduates.	
8	Welcome the <b>replication of private-sector youth initiatives</b> on internships and apprenticeships to more countries, including technical assistance and capacity building of stakeholders. Recommend using uniform procedures for selection, engagement and mentoring of interns.	Belgrade, Written comments	In Croatia, the EBRD is working closely with the Employer's Association to implement the Croatia Youth Initiative, a programme that establishes a quality standard for internship, which has attracted over 100 companies to date, creating over 600 internship opportunities within the first year. A web portal is created to provide a streamlined procedure for internship application and selection. We are now working on expanding this programme to Serbia and other parts of the Western Balkans, building on the lessons learned from the Croatia programme.	
9	It is important to put in place mechanisms to <b>protect the interns and their rights</b> in addition to the provision of internship places.	Belgrade, Written comments	In Croatia, EBRD drafted a template internship contract which was then signed among the employer, university and the intern. This is based on EU internship standards and reflects best practice. This model will also be applied as part of the expansion of the programme throughout the Western Balkans region and potentially beyond..	A reference to internship standards has been added.
10	For <b>SMEs</b> , establish dedicated training and capacity building on HR policies, such as helping HR departments with hiring, recruitment, and improving working conditions to attract talents.	Amman	EBRD delivers dedicated capacity building and knowledge transfer to companies as part of its Advice for Small Businesses programme. EBRD is also working with its clients to help improve and strengthen their HR policies and to introduce equal opportunities measures. In the context of the EIS, the Bank is now exploring new approaches to encourage training and work based learning at SME levels in the SEMED region.	A reference to SME level training provision has been added.

11	<p>The EBRD's inclusion strategy needs to ensure that <b>skills are transferable</b> considering the <b>mobility of the migrant/refugee workforce</b>. Regular labour migration opportunities must be made available for migrant and refugee workers, with a focus on skills and jobs matching, skills recognition, training and accreditation (including recognition of prior learning) and equal treatment. Consider a two-track approach to improving access to labour markets for refugees: a medium- to long-term vision of employment-inducing economic growth, and immediate job creation through activities such as Employment Intensive Investment Programmes.</p>	Istanbul, Written comments	<p>The EBRD, together with other international organisations such as ETF, ILO and OECD, is working with local government bodies to identify ways to efficiently verify the skillset of refugees in Turkey and Jordan. In addition, training provision targeted at refugees provides broader employability training as well as specific vocational skills training in order to maximise the transferability of skills beyond the initial employment opportunities. In Jordan, the EBRD investments and refugee support are closely aligned with the country's medium-term growth strategy in the context of the Jordan Compact.</p>	
12	<p>Overcoming the <b>refugees' legal rights to work</b> is the key to integrate refugee population in formal employment.</p>	Amman, Written comments	<p>The EBRD is working with the Ministry of Labour in Jordan to address this issue by clarifying a set of 'open' jobs in sectors such as retail, tourism and hospitality. The local training programmes are aligned to support refugees into such jobs. In Turkey, the Bank provides capacity building to employers and local authorities to create formal employment opportunities for refugees.</p>	<p>A reference to formal employment support for refugees has been added.</p>
13	<p>The strategy should also consider the key element of <b>access to social protection and social security for migrant workers</b> and refugees, including portability of social security benefits in situations of return and reintegration in countries of origin or resettlement for refugees.</p>	Written comments	<p>EBRD's refugee response programmes carefully consider refugees' access to social protection and security and the implication of employment on the rights/benefits associated with refugee status. The Bank works closely with the UNHCR, ILO, and relevant government ministries to ensure that the employment opportunities are compatible with the protection measures; and with the private sector to promote working conditions that are conducive for both local and refugee populations in comparison with social benefits.</p>	

14	The issue of <b>language</b> is a specific and challenging issue for the economic inclusion of refugees. This will require significant additional resources to promote access to employment, training and entrepreneurship opportunities.	Written comments	The EBRD recognises the issue of language as a potential barrier to economic inclusion. In Turkey, EBRD works closely with the UN organizations (UNHCR, UNDP) that provide Turkish language training for Syrian refugees. We are also working with the Gaziantep Chamber of Commerce to develop Arabic training and test materials in relation to the VocTest Centres.	
15	The access to education and training in certain jobs is limited by existing <b>regulatory and legislative barriers</b> for certain groups, specifically women. Include advocacy for regulatory and legislative changes on occupational restriction.	Almaty, Istanbul, Written comments	As part of its policy dialogue programmes, the EBRD engages with public authorities to reduce or lift occupational restrictions that limit the access to women to high growth sectors such as mining, power, and energy sectors in Kazakhstan. The Bank's Strategy for the Promotion of Gender Equality (SPGE 2015) provides further details on these activities.	
16	There is a <b>gap between equal opportunities legislation and implementation</b> . Increasing the awareness of the benefits of diversified workforce among the private-sector companies and the society as a whole is crucial to overcome the implementation gap. Incentives can be introduced to recognise and encourage the companies that introduce improved equal opportunity human resources (HR) policies.	Almaty, Amman	EBRD believes that there is a strong business case for a diversified workforce. In relation to gender, this is detailed in the SPGE 2015, where the Bank supports clients to enhance HR equal opportunities policies and practices, particularly in relation to recruitment, training, career progression and mentoring. The same principles are expected to be applied in the context of other potential target groups (specifically people with disabilities).	The reference to equal opportunities programmes at project and policy levels has been strengthened.
17	<b>Link the inclusion strategy with country priorities and associated growth potentials.</b> For example, identify sectors that have growth potential to ensure scalability; support the economic diversification through training of new labour market entrants or re-skilling of the existing workforce, such as the diversification from coal and mining sector to renewable	Amman, Almaty, Written comments	The EIS is embedded into the EBRD's country strategy priorities, which inform policy dialogue objectives as well as project level investments. In this context, the EBRD supports clients to re-skill and up-skills its workforce and partner with local schools or universities to enhance their R&D activities, foster innovation and diversification where	The link between the EIS and country strategic priorities has been highlighted more clearly.

	energy.		appropriate.	
18	<b>Working conditions and wage differentials across sectors</b> must be considered when addressing the employment issues.	Amman	The EBRD's Environmental and Social Policy (ESP) stipulates a range of performance requirements in relation to working conditions that all of the Bank's clients must adhere to (e.g. ILO decent work standards). In addition, the Bank is working with its clients to address fair recruitment, access to training and career progression policies and practices through its equal opportunities programmes.	
19	The strategy should recognize the <b>mega changes</b> happening at the global level; potential implication on skills, employment, and economic inclusion; and the ways through which EBRD can support the private-sector and foster policy dialogue during the transformational process. Some of these changes include climate change, globalisation, atomisation, digital revolution, and artificial intelligence.	Istanbul, Written comments	As part of the strategy, EBRD, in partnership with the ETF and the ILO, will explore programmes to better understand the challenges of Industry 4.0 and technological advances, how they manifest themselves across the region, what skills will be required in the future, which skills will no longer be necessary, and how clients and policy stakeholders can shape the training provision and attitudes of both the employers and employees.  Climate change is recognised as a global challenge. EBRD is investing in clean energy/infrastructure jobs, and is working with relevant partners to prepare young people for future employment in these sectors.	
20	It is important to address the <b>negative demographic trends</b> and increased <b>outgoing migration</b> (particularly among young people), which lead to labour shortages despite high unemployment.	Written comments	The extent of outgoing migration is closely linked with the availability of educational and economic opportunities in less developed regions. The Strategy's focus on youth as well as regional inclusion puts a strong emphasis on this point and respective operational responses are specifically designed to come up with sustainable solutions which could help addressing these challenges.	A reference to migration has been added.

21	Consider ways to harness <b>synergies between different target groups</b> , such as the inter-generational transfer of knowledge from an ageing workforce to young people through targeted training or mentoring programmes.	Almaty	Inter-generational transfer of knowledge is expected to be a key component in the context of training programmes that include a focus on ageing populations. The EBRD has established a set of case studies and best practice examples from across the private sector (e.g. retail, manufacturing), where complimentary skills are fostered through mixed-age teams, mentoring and reverse mentoring.	A reference to mixed-age team and intergenerational knowledge transfer has been added.
22	Recommend to rephrase “introduction and expansion of Qualification Frameworks” and replace with “support the implementation of National Qualification Frameworks”; and “skills verification” with “skills validation” (slide 20).	Written comments	Relevant changes will be made in the document.	Relevant changes have been made.
<b>Entrepreneurship and Access to Finance</b>				
23	On access to finance, the strategy should recognise more clearly the <b>diverse needs/challenges faced by different target groups</b> . Financial inclusion programmes should be tailored to age, gender or other characteristics of the target groups to meet their needs, and the type of needs (e.g. micro-finance, SME financing, etc.). Support should include both <b>financial and non-financial support</b> (such as business training programs and financial management, parafiscal services).	Almaty, Belgrade, Written comments	The EBRD's operational response focuses on supporting the establishment of dedicated credit lines and associated technical assistance to PFIs for the development and implementation of financial products and processes that are targeted at a specific group (e.g. women entrepreneurs, SMEs in remote regions, refugees) and address the challenges / barriers that these groups face. With the EIS, the EBRD seeks to further explore opportunities to enhance youth entrepreneurship and youth skills development in enterprises through micro-loans, vocational and skills development, business advice.	
24	<b>Business finance should be enhanced at all stages</b> , from incubation to acceleration, SME finance, mid-cap, and large scale investments.	Almaty, Istanbul, Amman, Belgrade	The EBRD has various mechanisms that support the SMEs including on-lending from local PFIs to a specific set of SMEs (e.g. Women in Business, SMEs in less developed regions, SMEs in specific sectors, etc.) to business advisory services aimed at start-up and growth SMEs. The EBRD is also	A reference to SME support across business stages has been added.

			partnering with micro-finance lenders and has begun to work with incubators and accelerators in a number of countries.	
25	Entrepreneurship support needs to take into consideration the different motivations (and success rates) of <b>career entrepreneurs versus reluctant entrepreneurs</b> (where entrepreneurship is pursued due to a lack of other opportunities and as a last resort measure to ensure livelihood provision).	Almaty, Istanbul, Amman	This is an important issue that is being factored into the baseline assessments for the Bank's Women in Business programmes as well as regional access to finance programmes.	
26	Consider developing a financial support programme for <b>young people to take-up paid or unpaid internship opportunities</b> within or outside of the country.	Istanbul	The EBRD's Croatia Youth Initiative establishes a set of internship standards and creates a platform for 'internship brokerage' between companies, school/universities and students. In addition, the Bank works with clients to offer internship opportunities and, where appropriate, international (accredited) training programmes.	A reference to internship standards has been added.
27	<b>Women</b> face various barriers to develop their businesses because of cultural norms, lack of a working background and lack of childcare support. It has proven successful to work with women in groups to exchange experience and build capacity.	Istanbul, Amman	The EBRD's Women in Business programmes work with PFIs to address perceptions of female entrepreneurs by PFI employees (from management to loan officers) which are often shaped by cultural norms. Furthermore, the Bank recognises the importance of local (affordable) childcare services. Their availability (or lack thereof) forms part of the Bank's gender access to finance inclusion gaps assessment.	
28	Access to finance is perceived to be a major obstacle for <b>refugee entrepreneurs</b> . Their access is significantly limited due to administrative requirements that make it hard / impossible to open a bank account and due to the backlog in registrations. Potentially, the local authority could play the role of guarantor or similar to support these groups with obtaining	Almaty, Istanbul, Amman, Written comments	The EBRD has operational projects with micro finance institutions in Jordan, to enhance access to finance and advisory services for refugee MSMEs. EBRD is working to enhance its operational response in Turkey. Furthermore, the EBRD is working with community centres to establish informal loans and saving schemes to help refugees gain	A reference to enhancing access to finance for refugees and host communities has been added.

	loans. Other obstacles also include access to local, national and international supply chains to source raw materials, cultural trading practices and market development, including potential export markets. Enterprise development programmes for refugees should also consider a complete and holistic migration cycle that benefits host and origin countries and reinforces the link between migration and development.		access to finance.	
29	When designing financial inclusion programmes, be aware of <b>potential negative consequences</b> (such as free-riding) and put in place necessary measures to prevent unintended negative consequences.	Istanbul	The EBRD's small business finance and capacity building programmes are informed by its research on microfinance programmes and their potential (and unintended) negative effects. For programmes such as Women in Business programmes, the EBRD clearly define its target group within project policy statements to minimise the risk of 'free-riders'. Any financial inclusion programme of the EBRD is based on sound banking.	A reference to the EBRD's research programmes on micro-finance and financial inclusion more broadly has been added.
30	The strategy should explore <b>new ways of conducting banking transactions</b> (such as mobile banking) and its potential and implication on economic inclusion. Digital financial inclusion has a number of benefits, particularly for refugees, in terms of access to electronic payments in an emergency for cash relief, but also longer-term benefits in terms of financial management, particularly for women, being more secure.	Amman, London, Written comments	The EIS seeks to further enhance the Bank's operational response in terms of access to finance and, more broadly, financial inclusion. The EBRD has conducted programmes in Tajikistan and elsewhere to support mobile banking and enhance the regulatory framework for mobile financial services.	
31	There is a need to diversify away from traditional banking towards <b>new sources of finance for start-ups/MSMEs</b> such as impact investors, venture capital, and smart capital. EBRD may consider financial provision to these diverse sources of finance, or technical assistance for them to better reach inclusion	Amman	Under the EIS, the Bank will further explore opportunities to participate in or establish social impact investment programmes or social enterprise support in line with best practice and existing expertise	

	target groups.			
32	The EIS's focus on <b>Social entrepreneurship</b> is welcome as it is well positioned to enhance the inclusion of the various target groups. However, social entrepreneurship is still at a starting point in most countries and not yet well defined or regulated. Private sector expertise could help social enterprises improve their business models.	Almaty, Istanbul, Amman, Belgrade, Written comments	The EBRD recognises that social enterprises play an important role in tackling issues of inclusion and has contributed to efforts to increase visibility of the social enterprise sector, including through the Bank's support for the 2017 Social Innovation Forum held in Belgrade, Serbia, on 6 April 2017. EBRD is currently expanding its understanding of the social enterprise sector in its regions of operations and exploring ways to increase our engagement and support for social enterprises.	
33	<b>Policy dialogue</b> is encouraged to engage the government <b>to remove legislative barriers for SMEs and entrepreneurs</b> (e.g. taxation, restrictions on social entrepreneurship, collateral, etc.), provide customised financial instruments, incentives, and policies for entrepreneurs and SMEs (e.g. credit insurance and tailored instalments), and to remove legal barriers for micro-financing. Capacity building of local institutions should also complement by policy advocacy.	Amman, Almaty, Written comments	<p>The EIS seeks to further enhance the EBRD's operational response in terms of financial inclusion - and explore possible policy engagements, including for example policy dialogue to remove legislations which limits women's ability to accumulate assets and mobilise collateral. The EBRD is also looking for ways to address the issue of micro-finance with other banks in the region. For example, the EBRD is looking to engage with the Serbian National Bank to amend the micro-finance law.</p> <p>More broadly, the EBRD's Financial Sector Strategy includes the support for local MSMEs through debt and equity operations for banks and non-bank financial institutions and the promotion of financially sustainable energy efficiency projects. At the same time, the Financial Sector Strategy introduces a greater focus on enhancing financial intermediation, with the strategic objective to foster deeper and broader financial intermediation in countries through innovative financial</p>	A reference to the EBRD's Financial Sector Strategy has been added.

			products to reach under-served market segments and strengthen competition and market effectiveness in the financial sector.	
34	Suggest adding to the “operational responses” section on Entrepreneurship and Access to Finance a more <b>analytical element</b> , such as assessing business and financial markets with a focus on women entrepreneurs, in order to establish market opportunities for scalable and replicable services.	Written comments	Such detailed country level analyses are undertaken as part of the baseline assessment of projects or programmes (e.g. the Women in Business programmes) and provide an important element in the development of the response package.	A reference to baseline assessments has been added.
<b>Access to Services that Enhance Economic Opportunities</b>				
35	The strategy should emphasize the need to promote <b>health and safety</b> programs within private sector organizations. Practical skills in this area are especially important in sectors that carry a high safety risk (e.g. oil and gas, etc.) or related to service delivery (e.g. water management, public transportation).	Almaty	The EBRD's operations have a strong focus on implementing health and safety programs in the country. The Bank works with clients and its employees across a range of high risk sectors to enhance local training and monitoring processes. Health and safety training is also incorporated into vocational skills programmes in high risk sectors (e.g. mining).	
36	Adopt <b>regional or community-level approach for public services and social infrastructure provision</b> , since the needs vary across different regions of the country as well as the current availability and accessibility of these services. Capacity building of local institutions could be important to ensure inclusive delivery of public services, as well as broadening the strategic partnerships with local regional and local advocacy/development organisations.	Amman, Belgrade, Istanbul, Almaty, Written comments	Regional inclusion and access to public services are one of the priorities of the EBRD's inclusion strategy. In practice, EBRD promotes the implementation of Stakeholder Participation Programmes (SPP) in municipal and environmental infrastructure investment projects. Where relevant, the Bank also engages and builds capacity of local civil society organisations to support SPPs and ensure inclusive delivery of services provided by the project.	A reference to local capacity building has been added.

37	Consider <b>safety, reliability, accessibility and affordability</b> with regards to transportation, utilities and other public services. The adoption of ICT in public services provision can enhance the safety, reliability, accessibility and affordability through better data monitoring and enforcement (e.g. track and monitor fare collection). Access to high quality facilities, transport infrastructure and utilities must also be afforded to regional areas so as to stem the demographic decline in regional areas due to migration flows to large urban centres.	Amman Written comments	The EIS seeks to enhance access to economic opportunity by improving access to transport and public services. The quality, reliability and affordability of these services are key factors in this context. The EBRD's Environmental and Social Policy ensures the compliance of the Bank's clients with relevant safety performance requirements. E.g. safe transport has become an area of focus for the Bank specifically in relation to gender (e.g. safe municipal transport provision for women), as well as more broadly (e.g. road safety programmes in the Western Balkans and elsewhere).	
38	Access to <b>communication and ICT</b> is important for remote regions for people better understand the types of public services and economics opportunities available to them. Stable ICT access can also facilitate distance learning which can be particularly beneficial for disabled populations or remote areas.	Almaty Amman Belgrade Istanbul Written comments	The EIS seeks to foster economic inclusion by supporting access to improved ICT connectivity that promotes access to markets, education/training opportunities, entrepreneurship or financial inclusion.	
<b>Cross-cutting: Alignment with global objectives</b>				
39	The links between the EIS and the <b>sustainable development goals</b> (SDGs) should be more clearly highlighted in the strategy document.	London, Written comments	The EIS does reference the SDGs, however, an Annex will be added to provide more detail.	An Annex has been added to clarify the link between the EIS and the SDGs.
40	Recommend to highlight links to the <b>Global Compact on Safe, Regular and Orderly Migration, the Comprehensive Refugee Response Framework and the Global Compact for Refugees</b> .	Written comments	These are being referenced as part of the EBRD's refugee crisis response programme as well as at a country and project level.	
<b>Cross-cutting: Policy dialogue / Consideration of economic, political, and social contexts</b>				
41	<b>Highlight reference to policy dialogue</b> as an operational response to the EIS objectives. The	Almaty, Written	The EBRD focuses on the institutional and legal framework through its policy dialogue by	The focus on policy and legal / regulatory reforms

	EBRD's focus is primarily on practices and procedures, rather than addressing institutional and legal framework reform in its strategy. However, there is still a large gap in legislation towards the implementation of the economic rights of certain underrepresented sub-groups. The strategy should therefore also address decision makers.	comments	bringing together the private sector with relevant public sector stakeholders (e.g. Ministries for Education). Additionally, the EBRD also engages directly with government authorities to remove regulatory barriers for women to perform all types of occupations (e.g. in Kazakhstan).	has been strengthened.
42	In <b>EU accession countries</b> , consider the alignment between the EBRD's economic inclusion objectives and EU accession requirements.	Belgrade	The EBRD's policy engagement on skills and inclusion aligns with the EU's strategic focus on developing National Qualification Standards (e.g. Turkey, the Western Balkans countries). EBRD investments broadly support the COO's transition towards inclusive and sustainable market economies - and this in this context also foster the progression towards EU accession requirements. The EBRD's partnership agreement with the European Training Foundation (ETF) furthers the alignment of activities in this context.	
43	Refugee inclusion programmes must be closely <b>aligned with existing initiatives in the host countries</b> and be aware of the potential effect of refugee crisis on local communities and the private sector.	Istanbul, Amman, Written comments	The EBRD is implementing refugee crisis response programmes in Turkey and Jordan which are based on a regional approach that seeks to address the needs of host communities as well as those of refugees - specifically in relation to access to skills and employment (Abdali Mall retail training which is now open to refugees as well as Jordanians), access to services (again examples from Jordan and Turkey on municipal infrastructure improvements) and access to finance. In Turkey, there is already a refugee program, which will be further expanded based on the lessons learnt. In this context the EBRD is coordinating its programs with other local, national or international organisations such as	The reference to the importance of partnership approaches has been strengthened.

			<p>the Ministries of Labour, Education, local authorities, UNHCR, WB, ILO, OECD, IFIs, CSOs, business organisations and others.</p> <p>In addition, the Bank is conducting skills mapping studies and an assessment of the challenges faced by SMEs in the regions of Turkey that are most affected by the refugee crisis. These studies are closely coordinated with relevant national and international organisations.</p>	
44	It is important to consider the extent and impact of the <b>informal sector</b> in relevant aspects of the strategy, especially in the context of refugees.	Amman Written comments	The informal economy is a major barrier (or distraction) for young people across many parts of our region to access formal jobs. The EBRD is working with its clients to strengthen progression routes into formal jobs (e.g. at vocational levels). In addition, the Bank specifically supports refugees to access formal employment.	A reference to formal employment support has been added.
45	The strategy should reference <b>measures against corruption</b> at corporate governance or policy levels, and to integrate measures to foster policy dialogue on public sector governance with a focus on public firms and privatization practices. Also, indicators on the justice system may be added to the Compendium of Indicators. For example, corruption is a big deterrent to foreign investments that are potentially job-creators, and corruption in recruitment processes prevents the full utilisation of talent. Explore potential synergies with the EBRD's on-going governance programmes in relevant countries.	Almaty, Amman, Belgrade, Written comments	Synergies are being developed with the Bank's Investment Climate and Governance Programme (ICGI). In addition, the introduction of transparent HR policies (through equal opportunities programmes) in relation to recruitment, internal training and career progression is a major step towards opening up opportunities to a wider group of applicants or employees.	A reference to synergies with the ICGI has been added.

Cross-cutting: Broadening and deepening of target groups				
46	<p>The <b>broadening of target groups is welcome</b>. Suggest that the EIS explains the rationale for the choice of certain groups.</p> <p>In addition, the EIS should more explicitly focus on people with <b>disabilities</b> and individuals that belong to a <b>minority ethnic and/or religious group</b>. These groups are of particular relevance for the Western Balkan region. The focus should not be exclusively on one specific group (e.g. on Roma) but also on other minority groups (religious, ethnic, indigenous).</p>	Almaty, Belgrade, London, Written comments	<p>The EIS does provide for the careful and gradual widening of the Bank's inclusion approach to other groups such as people with disabilities and Roma. This widening will be done in the context of the country strategies (and associated diagnostic studies) and where the Bank is able to address the inclusion challenges these groups face through its operations and engagement with clients.</p> <p>The EIS outlines the rationale and criteria for targeting specific groups that (i) face disproportionate barriers to economic opportunity, (ii) constitute a substantial political or economic priority in the country, and (iii) where there is a clear business case for the Bank to foster their economic inclusion through private sector engagement and associated policy dialogue.</p>	The focus on Roma is made more explicit in the updated EIS.
47	Suggest considering the <b>LGBT</b> community and the disadvantages they may face, including the lack of access to finance, particularly in more traditional countries.	Written comments	<p>As per the ESP (2014) other groups may include those that, by virtue of their sexual orientation, religion, ethnicity, indigenous status, economic disadvantage or social status, experience disproportionate barriers to economic opportunity.</p> <p>Any such additional groups will be identified as part of the Bank's country strategy process (and associated diagnostic studies), to assess the specific challenges that they face as well as possible operational responses by the EBRD.</p>	

48	Clarification is required as to what " <b>regions</b> " refer to in the Strategy as a target group. Do farmers form a specific target group in underserved areas?	Istanbul	Regions' refer to those groups who face disproportionate barriers to economic opportunity due to their place of birth - those who are born in peripheral regions as opposed to central regions, and - as a consequence - find it harder to access high quality education, employment, business finance or services. Farmers in less developed regions within a country may fall into this target group (but farmers in developed regions are unlikely to).	The definition of 'regions' in the EIS has been made more explicit.
49	Significant prevalence of <b>single-motherhood</b> raises the spectre of child welfare requirements that need to be addressed in an adequate manner.	Written comments	The availability of quality and affordable childcare is an important factor to enable women to access work and entrepreneurship opportunities. The EBRD's Strategy for the Promotion of Gender Equality outlines this in more detail, and a study of the care economy is currently under way in Turkey.	
50	The strategy should establish the <b>seniority of particular target groups</b> over others in a set order of priorities to address eventual conflicts or incompatibility in specific scenarios and clearly outline EBRD's approach. For example, projects improving youth and women inclusion while simultaneously increasing the intra-country regional economic divide; as well as projects promoting a 'silver economy' while neglecting youth inclusion.	Written comments	The EBRD's inclusion ATCs (Assessment of Transition Challenges) identify the disproportionate barriers that each of the target groups face in each of the EBRD's countries of operation. This allows for a prioritisation of specific groups in a country context – e.g. gender and youth in the SEMED region and Turkey, youth and regional inclusion in the Western Balkans, etc. Potential additional target groups (ageing workforce, disabled, etc.) will be considered at a country level, with gap assessments undertaken for these groups. Any potential conflicting impact at project and policy levels is assessed in this context.	
<b>Cross-cutting: Impact monitoring and evaluation</b>				
51	EBRD's development of a <b>compendium of indicators</b> (CoI) is received positively, but this should be presented in the main strategy	Almaty, Bilateral meetings,	The EBRD will add a reference to the EIS Performance Monitoring Framework into the EIS main text.	A reference to the CoI has been added into the main section of the EIS.

	<p>document instead as an annex. It is also recommended that country-level monitoring frameworks are developed, and that the impact is monitored in the long term beyond the project/repayment horizon.</p> <p><b>Different measurements tools might be useful at pre- and post-investment stages.</b> On the latter, propose reinforce outcome indicators with measures focusing on employment creation and more qualitative assessment of the effect of capacity building measures and skills acquisition. The Donor Committee for Enterprise Development (DCED) Standard would be a useful tool in establishing results chains for desired outcomes of EBRD interventions and investments.</p>	<p>Washington DC, Written comments</p>	<p>Progress and impact during the project / repayment phase is monitored through the Bank's Transition Impact Monitoring System (TIMS) against a set of agreed output, outcome, and impact indicators. Longer term impact is assessed by the Bank's Evaluation Department and – at a country level – through its review and update of country strategies and associated diagnostic studies.</p>	
52	<p>In the choice of indicators, be aware of the <b>limitation of certain data sets</b> (e.g. Life in Transition Survey) and try to use multiple sets of comparable indicators. These may include: World Economic Forum (WEF)'s firing flexibility data and the OECD Indicators of Employment Protection for labour market structure; Eurobarometer, Transparency International and World Bank data on corruption and quality of government.</p> <p>Suggest explaining how <b>the lack of data availability in certain countries</b> (e.g. MENA region) is dealt with.</p>	<p>Written comments</p>	<p>The EBRD uses cross-country comparable data sets for its inclusion gap assessments and works, including WEF firing flexibility data, ILO KILM data, World Bank's Development Index, and Global Findex data. For regional inclusion, within country regional disparities are assessed using LITS data. The EBRD has recently commenced the use of Gallup data to further support its efforts in this context. OECD data is referred to where applicable, but it often covers a limited set of countries that overlap with the EBRD's countries of operation. Overall, the EBRD is striving to update the indicators used for the ATCs on a regular basis and any suggestions for relevant and up to date data sets are welcome.</p> <p>Where the necessary data is not available, ATC gaps are left blank. In some instances,</p>	

			the Bank also commissions its own research (e.g. analytical papers; baseline and impact assessments) to support country or sector specific baseline assessments or impact evaluations.	
53	Recommend adding a stronger focus on <b>spill-over effects</b> of the inclusion activities beyond individual EBRD investments, e.g. in the form of peer learning, training of trainers etc. Further strengthen the emphasis on systemic impact through scaling up successful and replicable pilot projects, constructive lessons learned and emerging good practices.	Bilateral meetings, Written comments	EBRD's inclusion (and broader transition) methodology focuses on achieving systemic impact that goes beyond the confines of an individual project. Local capacity building, training of trainers and the set-up of sustainable training programmes are cornerstones of the Bank's inclusion approach. The EBRD actively seeks opportunities to scale up successful project-level approaches through policy dialogue or replicate in other countries of operation based on careful assessment of lessons learnt, potential impact, and complementarity with existing efforts.	The reference to systemic impact has been clarified to better explain the focus on spill-over effects and long term impact.
<b>Cross-cutting: Implementation / Partnerships</b>				
54	Utilise more <b>local consultants</b> in the delivery of the EBRD's economic inclusion technical assistance. In the case of engaging international consultants, make sure that there is transfer of knowledge to the local population.	Almaty	Knowledge transfer to local consultants is increasingly built into inclusion programmes across all sectors and regions, including training of trainers.	The focus on training of trainers and local consultants has been strengthened.
55	Implementation of economic inclusion should aim to <b>utilise existing programmes</b> of companies/clients. New educational programmes should be established to complement the required training.	Almaty Written comments	The EBRD seeks to work with existing local programmes and enhance their capacity in the first instance. In this process, the EBRD facilitates the link between the training/education institutions and the prospective employees to aligned the requirements. Training of trainers, capacity building, and knowledge transfer are embedded in most programmes.	The focus on local capacity building has been strengthened.
56	EBRD should <b>strengthen ties with the public sector, including local governments</b> . This could be done through the development and	Almaty, Istanbul, Amman,	The EBRD has implemented a number of projects on inclusive procurement. The EBRD brings in technical experts to work with its	

	implementation of public-private partnership instruments (PPP). Inclusive procurement, either as part of public procurements or as supply chain contracts, is an important instrument for enhancing access to employment and skills and is strongly welcomed in the strategy.	Belgrade, London, Written comments	clients to build processes that encourage private sector contractors to offer onsite training opportunities for trainees as part of their operations (e.g. road/rail maintenance, rehabilitation or construction). EBRD builds partnerships with schools and job centres, in order to open up work-based-learning opportunities for young people.	
57	Recommend the addition of <b>NGO specific programmes</b> in the strategy. In this context, consider that the stability of the legal and institutional framework for civil society development is weak and/or has been weakened in some countries of operation.	Almaty Amman Belgrade Written comments	For each country of operations, EBRD develops a country strategy which contains a formal assessment of the country's commitment to and application of the principles multiparty democracy and pluralism as set out in Article 1 of the Agreement Establishing the Bank. This assessment includes the review of the legal and institutional environment for civil society. It is widely consulted with local, national and international civil society stakeholders and provided for our shareholders' consideration before a country strategy is approved. When it comes to the EIS, the strategy is implemented via investment projects primarily with clients in the private sector (or the public sector for municipal infrastructure projects). Specific inclusion challenges are often best addressed through a partnership between the private or public sector client and civil society organisations (e.g. for training of trainers, outreach to specific groups such as refugees, etc.). The EBRD also works to build capacity of civil society organisations through knowledge transfer and technical cooperation projects under mechanisms including the Civil Society Engagement Unit's Civil Society Capacity Enhancement Framework.	A reference to civil society capacity building has been added.

58	Request to add <b>ETF</b> for the Turkey case under “Project or theme based partnerships”, bullet point “International Labour Organization (ILO) - industry 4.0 skills forecast, refugee training in Jordan and skills mapping Turkey”. ETF has joined the cooperation with EBRD/ILO Ankara for the Validation of Non Formal and Informal Learning (VNFIL) for refugees /migrants.	Written comments	A reference to the ETF will be added in the relevant sections.	A reference to the ETF has been added to relevant sections.
<b>Cross-cutting: Communications</b>				
59	There is a need to <b>enhance the awareness of the role of the private sector</b> in the context of the EBRD's inclusion strategy. In the awareness-raising process, clearly communicate the costs and benefits associated with economic inclusion, diversified workforce, and non-discriminatory practices at all levels from firms, industry, and policy. EBRD could stimulate participation by designing a label for businesses adopting inclusion practices and programmes. It is important to influence and contribute to setting the agenda, in order to bring about a paradigm shift in culture and behaviour towards disadvantaged groups by corporates and governments.	Almaty, Amman, Written comments	EBRD is working with its clients but also other private sector stakeholders to promote the business rationale for inclusion programmes (especially in relation to skills, workforce diversity, entrepreneurship etc.). The focus is on addressing business challenges and - at the same time - enhancing inclusion outcomes for specific groups. Through dissemination of best practice and lessons learned and knowledge sharing events, the Bank is working to further promote such practices and underline the business case at broader sectoral levels.	The focus on enhancing awareness and promoting the EIS externally to clients and policy stakeholders has been strengthened.